IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

INEOS FLUOR AMERICAS LLC,)
Plaintiff,)
v.) C.A. No. 06-189-SLR
HONEYWELL INTERNATIONAL INC.,)
Defendant.)))

APPENDIX OF EXHIBITS CITED IN LUCITE INTERNATIONAL'S ANSWERING BRIEF IN OPPOSITION TO HONEYWELL'S MOTION TO COMPEL DOCUMENTS FROM LUCITE INTERNATIONAL

VOLUME II

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May 29, 2007

The following exhibit is contained in this Appendix:

Exhibit C: Transcript of Ron Coyle Deposition, Feb. 28, 2007 (pp. 1 and 15-17).

CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on May 29, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on May 29, 2007, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

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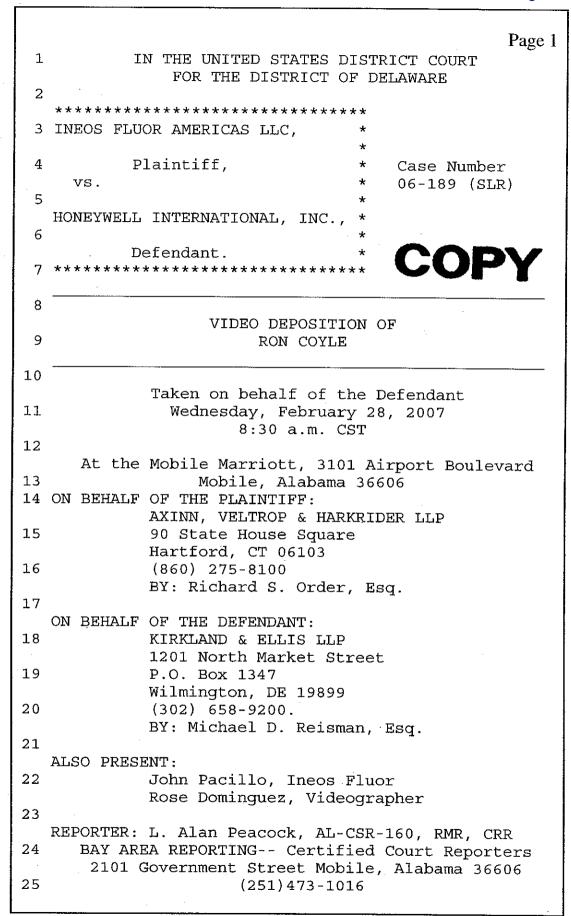
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EXHIBIT C



Page 15 1 agreement? Yes, I do. 3 Q Are you prepared to testify about that 4 knowledge? 5 Α Yes, I am. And do you have personal knowledge of the 7 history of Ineos's supply relationship with 8 Honeywell? You mean, do I know some of it? I know 10 some of the history. 11 Do you have personal knowledge of that 12 history? 13 A I know some of the history, yes. 14 the history when I was involved with the business. 15 Are you prepared to testify about the 16 history that you're knowledgeable about? 17 MR. ORDER: Objection to the form. (By Mr. Reisman) You can answer. 18 Q 19 Yes. 20 You can put that one aside. 21 Now I'm just going to ask you a few 22 questions about Ineos Phenol. 23 Ineos Phenol, Incorporated, that's an 24 American corporation, right? 25 Α There's no Ineos Phenol, Incorporated.

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Page 16 1 Ineos Phenol is a division of Ineos Americas, LLC. 2 Q And where is Ineos Americas, LLC, 3 headquartered? Here in Mobile, Alabama. And what is your position today with Ineos 6 Americas, LLC? I'm the vice president of -- for the 8 Phenol division of Ineos Americas, LLC, I'm the vice 9 president of marketing and sales. 10 And what other divisions does Ineos 11 Americas, LLC, have? I'm not exactly sure. I think it's -- I 13 think the -- there's Ineos Oxide, Ineos Silicas, and 14 Ineos Phenol. And I'm not sure we have gone through 15 a restructuring, so I'm not sure which other 16 businesses are under Ineos Americas LLC. And what are your responsibilities as vice 18 president of marketing and sales? 19 Α I'm responsible for the marketing and 20 sales of phenol and acetone. Does Ineos Americas LLC have a parent 22 corporation? 23 Α Yes. 24 And what is the name of it?

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I'm not exactly sure, to be honest with

25

A

Page 17

- 1 you.
- 2 Q Are you aware of the relationship between
- 3 Ineos Americas, LLC, and Ineos Group Holdings PLC.
- 4 A Yes. I believe that's the parent company,
- 5 but I'm not sure.
- 6 Q Do you have -- in your current position,
- 7 do have you contact with anyone from Ineos Group
- 8 Holdings, LLC -- PLC?
- 9 A We have gone through several
- 10 reorganizations, so I'm not exactly sure who the
- 11 officers are of that organization. I would imagine
- 12 I do, but I can't say for sure.
- 13 Q In your position today, do you have
- 14 contact with anyone from the Fluor division of Ineos
- 15 Americas, LLC?
- 16 A No, not on a business basis.
- MR. ORDER: Objection to the form. It's
- 18 misstating his prior testimony.
- 19 Q (By Mr. Reisman) Do you have contact in
- 20 your current position with Mr. Pacillo?
- 21 THE WITNESS: In my current position, no.
- 22 Q (By Mr. Reisman) When was the last time
- 23 you had, on a professional basis, contact with
- 24 Mr. Pacillo?
- 25 A I don't remember. It was -- on a